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*Counsel for Defendant*  
**SIMILASAN CORPORATION**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

T.R.P. COMPANY, INC.

Plaintiff,

v.

SIMILASAN AG AND SIMILASAN  
CORPORATION,

Defendants.

Case No.: 2:17-cv-02197-JCM-CWH

**JOINT STIPULATION TO AMEND  
PLEADINGS AND ~~PROPOSED~~  
ORDER**

1 Plaintiff and Counterclaim-Defendant T.R.P. Company, Inc. ("TRP"), Defendant and  
2 Counterclaimant Similasan Corporation ("Similasan") and Defendant Similasan AG ("AG"),  
3 jointly stipulate to amend the pleadings as follows:

4 **STIPULATION**

5 WHEREAS, TRP filed its Complaint [ECF No. 1] on August 16, 2017;

6 WHEREAS, Similasan filed its Answer and Counterclaim [ECF No. 19] on  
7 September 14, 2017;

8 WHEREAS, TRP filed its Answer to Similasan's Counterclaim [ECF No. 21] on  
9 October 5, 2017;

10 WHEREAS, AG filed its Motion to Dismiss [ECF No. 24] on October 17, 2017;

11 WHEREAS, AG's Motion to Dismiss has been fully briefed and is currently pending  
12 before the Court;

13 WHEREAS, the last day to amend the pleadings pursuant to the Court's Scheduling Order  
14 [ECF No. 38] is April 13, 2017;

15 WHEREAS, both TRP and Similasan desire to amend their claims against the other party;

16 WHEREAS, TRP's proposed First Amended Complaint is attached as Exhibit A;

17 WHEREAS, Similasan's proposed First Amended Counterclaim is attached as Exhibit B;

18 IT IS STIPULATED by and between TRP and Similasan through their respective  
19 attorneys of record that:

20 1. TRP may file the First Amended Complaint attached as Exhibit A, and it will be  
21 deemed filed and served as of the date of the order granting this stipulation.

22 2. Similasan may file the First Amended Counterclaim attached as Exhibit B, and it  
23 will be deemed filed and served as of the date of the order granting this stipulation.

24 3. TRP and Similasan will respond to the respective amended pleadings within 30  
25 days of the order granting this stipulation.

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28 ///

4. AG's previously filed Motion to Dismiss for Lack of Personal Jurisdiction will be deemed responsive to TRP's First Amended Complaint, and no further briefing will be required to allow the existing briefing [Dkt. Nos. 24, 30, 34] to be decided by this Court.

DICKINSON WRIGHT PLLC

CROWELL & MORING LLP

/s/ Michael N. Feder

/s/ Michelle Gillette

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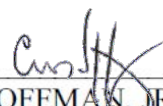
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*Attorneys for Plaintiff T.R.P. Company, Inc.*

IT IS SO ORDERED.

DATED: April 19, 2018

  
C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE

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*Attorneys for Defendant SIMILASAN  
CORPORATION*

**ORDER**

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATE: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of CROWELL & MORING, LLP, and on this 12th day of April, 2018, I served the document entitled, **JOINT STIPULATION TO AMEND PLEADINGS AND [PROPOSED] ORDER**, on counsel of record through the CM/ECF system.

Lupe Flores  
Employee of Crowell & Moring LLP